



April 8, 2022

Via email: Jeremy.dommu@ee.doe.gov, NEMA, et al

Mr. Jeremy Dommu
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-5B
1000 Independence Avenue
SW Washington, DC 20585-0121

Ex-parte meeting follow-up

Docket Number: EERE-2020-BT-TP-0011

Dear Mr. Dommu,

Thank you for your time and assistance setting up yesterday's ex-parte meeting with various National Electrical Manufacturers Association (NEMA) members who were also present at the meeting and copied on this transmission. We request the public record reflect our discussion and the points noted below. The presentation we used is also included in portable document format (PDF) and being distributed to all who participated in the meeting.

North Carolina Advanced Energy Corporation ("Advanced Energy") is a 501 (C) (3) business established by the North Carolina Public Utility Commission (NCPUC) in 1980. Both NEMA and DOE have characterized Advanced Energy in recent and previous public comments as DOE's lab, implying control or ownership by DOE. That is not accurate. Our board of directors includes utility members in the state of North Carolina and public members appointed by the sitting Governor of North Carolina. We operate under the direction and control solely of our board of directors.

Advanced Energy deems AEDMs as proprietary motor design tools owned and operated by motor manufacturers. As such we only require the efficiency outputs for each basic



model a manufacturer produces and we validate, through testing, those values. We never request the AEDM tools used by manufacturers or review them, only the efficiency outputs. We deem it a conflict of interest for any certification body to work on product design for the products it certifies. NEMA proposed the Department use its National Labs to develop “independent AEDMs” in recent comments. This may be of value to DOE and the industry, but we do not agree that these National Labs should also conduct product certification, for the potential conflict of interest reasons noted here.

Advanced Energy’s impartiality practices are documented in the public record when we successfully petitioned DOE to be recognized as a third-party certification program in 2020. We follow the guidelines required by ISO/IEC 17025 and ISO/IEC 17065 for all Advanced Energy staff working in our certification program and test laboratory. In addition, we have created an external (to the motor and drive team) Impartiality Officer and external (to Advanced Energy) Impartiality Committee. Both have been in place since Advanced Energy achieved ISO/IEC 17065 accredited status in 2018. In 2022, we have Impartiality Committee members rotating off our current committee as it is a voluntary commitment. We welcome the opportunity for NEMA to provide a staff member in 2022, if they so desire, to join our Impartiality Committee. We cannot accept a NEMA member company employee as that would be a potential conflict of interest.

Our comments were published on our capacity to test electric motors during the TEST NOPR period referenced in the docket above. Test capacity is a valid concern at this point because it is not clear what a final rule may look like. We would like to reiterate that our certification scheme (which is published in the public record) allows us to certify products in manufacturers labs under witness, so not all certification needs to be done in a certification body’s test lab. In addition, Advanced Energy has remained committed to motor efficiency testing for 33 years and to the best of our knowledge has never been a bottle neck for certifying electric motor efficiency. Our intention is to remain committed to electric motor efficiency as motor driven systems account for approximately 50% of all electric energy generated in the world. We have immediate steps we can take by adding more staff/shifts and if further equipment or certification investment is warranted, we are in a financial position to do so. We believe that electric motor growth will continue given the explosive interest in carbon. We see that already in industrial decarbonization



and electric transportation. As a public stakeholder in this process, we will remain vigilant and contribute all we can to electric motor efficiency.

Thank you again for your time and assistance in setting up the meeting and hearing our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kitt Butler', with a fluid, cursive style.

Kitt Butler
Senior Business Development